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June 9, 2015

Via ECF

Hon. Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007
WoodsNYSDChambers@nysd.uscourts.gov

Re: *Elizabeth Boey Chau, M.D. v. Hartford Life Insurance Company*
Civil Action No.: 14-cv-8484(GHW)
File No.: 02489-000294

Dear Judge Woods:

This office represents Defendant Hartford Life Insurance Company ("Hartford") in the above-referenced matter. We write to request a two (2) week extension of time for Hartford to file reply papers in further support of its Motion to Dismiss plaintiff Elizabeth Boey Chau, M.D.'s ("Chau") Amended Complaint, which is currently due to be filed on June 12, 2015. (Doc. No. 47).

By Order dated May 7, 2015, Your Honor granted Chau's request for an extension of time to submit her opposition in response to Hartford's motion to dismiss. (Doc. No. 47). Pursuant to the new briefing schedule entered on May 7, 2015, Hartford's reply papers are due to be filed by June 12, 2015. I am currently engaged in trial in New York State Supreme Court, Nassau County, before the Hon. Stephen Bucaria (i.e. *Josephson, et. al. v. Oxford Health Insurance Inc., et. al.*; Index No. 443/07), which is scheduled to continue for at least the next several weeks. Therefore, I respectfully request a brief two (2) week extension of time (i.e. until June 26, 2015) to file Hartford's reply papers. Plaintiff's counsel consents to this request and this extension does not affect any previously scheduled dates set by the Court. This is Hartford's first request for an extension of time to file its reply in further support of its motion to dismiss.

Thank you for your consideration of this matter.

Respectfully submitted,

s/
Michael H. Bernstein
Sedgwick LLP

cc: Robert J. Rando, Esq. (*Via ECF*)